

StarKist Samoa, Inc.

P.O. Box 368
Pago Pago, Tutuila
American Samoa 96799

January 11, 2008

Ms. Genevieve Brighthouse, ASCMP Manager
Department of Commerce
Executive Office Building Fl-2
Pago Pago, AS 96799

**Subject: Federal Consistency Certification Application:
NPDES Permit Renewal for
Treated Wastewater Discharge to Pago Pago Harbor**

Dear Ms. Brighthouse:

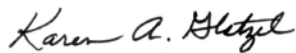
Under Section 307 of the Coastal Management Act (CZMA), non-federal activities that are conducted under Federal licenses or permits are subject to review by the American Samoa Government to insure consistency with CZMA. A proposal to renew the existing NPDES permit for StarKist Samoa, is hereby forwarded for your review and approval. A summary project description is enclosed with this letter.

This letter is to request for certification that the proposed activity comply with the ASCMP and will be conducted in a manner consistent with such program. A set of findings documenting that the proposed activity is consistent with the ASCMP is attached.

We understand that your office will circulate this consistency certification among Territorial and local government agencies that may be affected by the proposed activity. A timely response to this request for certification of compliance would be appreciated in lieu of operating under a deadline.

This request is submitted on behalf of StarKist Samoa, Inc (the Applicant) by gdc at the request and direction of the Applicant. Please call Karen Glatzel or Steven Costa at 707-677-0123 if you have any questions.

Sincerely,



Karen A. Glatzel
glatzel da costa (gdc)
P.O. Box 1238
Trinidad, CA 95570

Encl: [1] Project Description
[2] Summary of findings.

PROJECT DESCRIPTION

StarKist Samoa, Inc. and the COS Samoa Packing Company, Inc. each own and operate a tuna processing and canning facility located in the town of Atu'u on the Island of Tutuila in the Territory of American Samoa. Each facility receives frozen whole tuna that are processed and canned as tuna fish for human consumption and pet food, and processes fish by-products into fish meal. The StarKist Samoa, Inc. facility has a daily production of 564 tons of tuna processed per day, with a maximum daily production of 614 tons per day. The facility anticipates a maximum average daily production of 600 tons of tuna processed per day during the next permit term. The COS Samoa Packing Company, Inc. facility has an average daily production of 359 tons of tuna processed per day, with a daily maximum of 445 tons per day. During the permit term, the facility anticipates a maximum average daily production of 450 tons of tuna processed per day. Each facility is composed of a main industrial facility and a wastewater treatment facility. The main industrial facility consists of a dock, storage freezers, several fish processing areas, cannery, and shipping area. Each facility's wastewater treatment facility treats production wastewater and on-site storm water collected via its wastewater collection system.

StarKist Samoa, Inc. and the COS Samoa Packing Company, Inc. discharge effluent collected from each facility's wastewater collection system into Pago Pago Harbor via a single outfall shared by the two facilities (referred to as Discharge Outfall No. 001). Discharge Point No. 001, also known as the Joint Cannery Outfall or "JCO", is located approximately 1.5 miles seaward from the facilities. The discharge point terminates in a multiport diffuser at a depth of approximately 176 feet in the Outer Harbor of Pago Pago Harbor.

Pago Pago Harbor is a near-shore territorial water of American Samoa and is classified as an embayment that consists of an Inner, Middle and Outer Harbor, with fringing reefs throughout Middle and Outer Harbor areas. Pago Pago Harbor is intended for general, commercial and industrial use, while allowing for protection of aquatic life, aesthetic enjoyment and whole and limited recreational contact. Specific intended uses include the following: recreational and commercial fishing, shipping, boating and berthing, industrial water supply, and support and propagation of marine life.

The discharge outfall has been operating under NPDES permits since October 1992. This is the second renewal of the existing permits. EPA has made a preliminary determination that the draft NPDES permits will have no effect on any federally-listed threatened or endangered species.

The Administrative Record, including the permit applications, fact sheets, draft permits, public comments, and other relevant documents may be obtained by contacting Mr. Carl Goldstein of EPA by telephone at (415) 972-3767 or electronic mail at goldstein.carl@epa.gov. The draft permits and fact sheets may also be obtained by visiting EPA website: <http://www.epa.gov/region09/water/npdes/pubnotices.html>.

SUMMARY OF FINDINGS

a. Territorial Administration	This project is subject to local review for consistency with the Costal Zone Management Act
b. Village Development	Not applicable
c. Shoreline Development	None
d. Coastal Hazard	None
e. Fisheries Development	No effect
f. Slope Erosion	No effect
g. Major Facility Siting	Not applicable
h. Agricultural Development	Not applicable
i. Reef Protection	No construction is involved. The discharge is at a water depth of 176 feet. Studies conducted under previous permits have shown no degradation or detrimental effects to adjacent reef areas in Pago Pago Harbor.
j. Recreation/Shoreline Access	No effect
k. Water Quality	Monitoring done under the previous permits have demonstrated no detrimental effect on water quality. Monitoring will continue under the new permit
l. Marine Resources	No effect anticipated based on comprehensive and extensive studies conducted under previous permits
m. Drinking Water Quality	Not applicable
n. Unique Areas	Not applicable
o. Archaeological/Cultural/Historical Resources	Not applicable
p. Special Areas	Not applicable